

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) QUILL INK BOOKS LIMITED, a foreign  
corporation,

Plaintiff,

v.

Case No.: CIV-18-920-G

(1) ABCD GRAPHICS AND DESIGN, INC.,  
D/B/A BLUSHING BOOKS PUBLISHING, a  
foreign corporation, *et al.*,

Defendants.

**AFFIDAVIT OF KRISTINA BUSSE, PH.D**

STATE OF ALABAMA

)

)

ss:

COUNTY OF MOBILE

)

Kristina Busse, Ph.D, of lawful age and being duly sworn, allege and state as follows:

1. I have been designated as the corporate representative of for Quill Ink Books Limited, the named Plaintiff herein, pursuant to FED. R. CIV. P. 30(b)(6).

2. Being fully advised on the matters contained herein, I submit this Affidavit in support of Plaintiff's Motion for Partial Summary Judgment.

3. The MYTH OF OMEGA series was released through Draft2Digital, Amazon, Barnes and Noble, iTunes Apple, Rakuten-Kobo and Google Play. These online vendors sell e-books and print books to customers.

4. After the release of the first two books, *Crave to Conquer* and *Crave to Capture*, Blushing directed a "take-down" notice to Draft2Digital and other vendors on or about April 19, 2018.

5. From April 24, 2018 to May 16, 2018 Plaintiff received multiple reader inquiries stating the MYTH OF OMEGA books were missing from online vendors. Through these

communications, Plaintiff learned of Blushing's continuing efforts to disrupt Plaintiff's book sales.

6. On May 16, 2018, Draft2Digital's representatives advised Plaintiff that Draft2Digital and Barnes and Noble had removed the MYTH OF OMEGA series from sale because of the "take-down" notices.

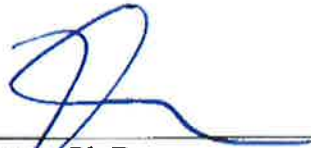
7. During the week of May 16, 2018, Plaintiff received communications from the vendors that "take-down" notices were now filed against all three books in the MYTH OF OMEGA series, including *Crave to Claim* which had not been published at the time the "take-down" notices were filed.

8. Further communications with vendors revealed that all three books of the MYTH OF OMEGA series were removed from sale.

9. iTunes removed Plaintiff's entire library of publications solely based on Blushing's false claims.

10. Blushing's "take-down" notices violated the Copyright Act, damaged Plaintiff's reputation and resulted in financial losses, including, but not limited to, pre-release and ordinary book sales in the United States and internationally.

FURTHER AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Kristina Busse, Ph.D  
Corporate Representative  
Quill Ink Books Limited

Subscribed and sworn before me by Kristina Busse, Ph.D, this 3rd day of June, 2019.

  
\_\_\_\_\_  
Notary Public

[Seal]

